

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

SILVIA VERONICA FUENTES,

*Defendant.*

### CRIMINAL COMPLAINT

Case No. 21-MJ-401-KEW

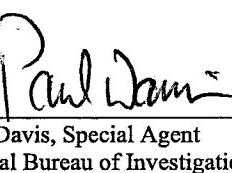
I, Paul Davis, the undersigned complainant, am a Special Agent with the Federal Bureau of Investigation and state that the following is true to the best of my knowledge and belief:

On or about March 18, 2021, in the Eastern District of Oklahoma, in Indian Country, SILVIA VERONICA FUENTES committed the offense of Failure to Stop for an Accident Involving Death in Indian Country in violation of Title 18, United States Code, Sections 13, 1151, and 1152, and in violation of Title 47, Oklahoma Statutes, Section 10-102.1.

This complaint is based on the following facts:

(See Affidavit of Paul Davis which is attached hereto and made a part hereof by reference.)

Continued on the attached sheet.

  
\_\_\_\_\_  
Paul Davis, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: October 21, 2021



\_\_\_\_\_  
Signature of Judicial Officer

UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer



**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Paul Davis, being duly sworn, depose and state that:

**INTRODUCTION**

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have been so employed since 2008. As a Federal Agent, I am authorized to investigate violations of the laws of the United States, and to execute warrants issued under the authority of the United States.

2. The statements contained in this Affidavit are based in part on information provided by other agencies; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that SILVIA VERONICA FUENTES (Fuentes) committed the below-described offense, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

3. As will be shown below, there is probable cause to believe that SILVIA VERONICA FUENTES committed the offense of Failure to Stop for Accident Involving Death in Indian Country in violation of Title 18, United States Code Sections 13, 1151, and 1152, and Title 47, Oklahoma Statutes, Section 10-102.1.

**PROBABLE CAUSE**

4. DEFENDANT: the defendant is SILVIA VERONICA FUENTES, hereinafter referred to as Fuentes, DOB: XX/XX/1986.

5. The victim is JACLYN DOBSON (Dobson). DOBSON was an enrolled member of the Cherokee Nation.

6. On March 18, 2021, at 21:54 hours, a fatal traffic collision occurred at the intersection of U.S. Highway 62 and South 460 Road in Cherokee County, Oklahoma. This location is within the Eastern District of Oklahoma and within the definition of "Indian Country" as it occurred within the boundaries of the Cherokee Nation Reservation.

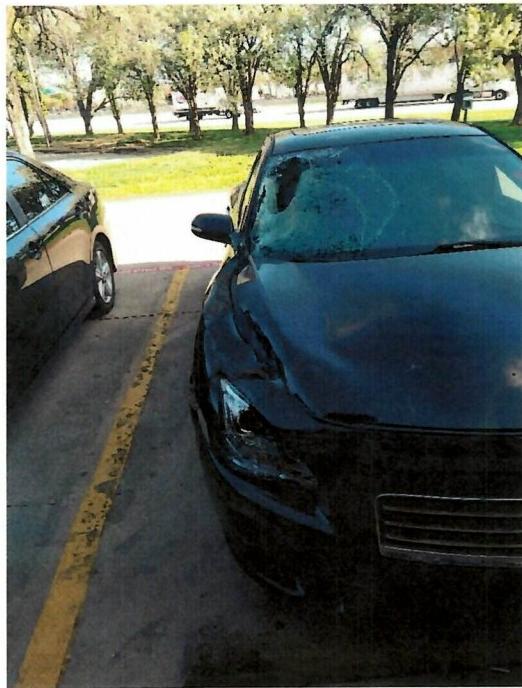
7. Troopers of the Oklahoma Highway Patrol were dispatched to the scene. Based on observations of evidence at the scene, including debris from a vehicle, and speaking to witnesses, investigators determined that a female later identified as Dobson, was travelling southbound on South 460 Rd. on her bicycle and was attempting to cross south U.S. 62, when she was struck by an unknown vehicle traveling westbound on U.S. 62. Dobson was assisted by another motorist until she was transported by air ambulance to St. John Hospital in Tulsa. She later died from her injuries.

8. The location of the collision is a rural, four-lane highway separated by an unimproved median. There are no traffic control devices. There are a small number of commercial businesses and residences located near the intersection. Investigators were able to retrieve surveillance video from several nearby businesses. A review of the videos shows that the collision occurred at 21:54 hours and that shortly after the collision, the suspect vehicle pulled over to the shoulder of the highway a short distance from the collision. The suspect vehicle stopped for approximately 10 seconds before resuming westbound travel on U.S. 62 and leaving the scene.

9. A search warrant was obtained directing Google LLC to provide all Google accounts/devices that were in the immediate vicinity of the collision two minutes before and after the crash. The data Google provided indicated that a device with a Google account crossed through the scene of the collision and surrounding highway from 21:54:18 to 21:54:35. The timing and location is consistent with the device travelling westbound on U.S. 62 at the exact moment of the

collision and is consistent with the behavior of the suspect vehicle on video. As a result, investigators then requested that Google identify the account associated with said device. Google revealed that the Google Account associated with the said device is 113526066595. The identified subscriber of the account is "silvia fuentes" with an email of "silviasaita@gmail.com."

10. Investigators then obtained a search warrant ordering Google to disclose additional subscriber information, location history data before and after the collision, as well as any photos, messages, emails, queries held by Google pertaining to Google Account 113526066595 "silvia fuentes." The data returned by Google identified Fuentes with a date of birth of XX/XX/1986. Additionally, one day after the crash, Fuentes took a photo (below) of a black Nissan Maxima, with damage to the front passenger quadrant. The damage is consistent with an automobile-pedestrian collision.



11. An analysis of the additional geolocation data provided by Google shows the user departed Fayetteville, Arkansas the evening of March 18, 2021, drove through the Eastern District of Oklahoma, and then arrived in the Dallas/Fort Worth, Texas, area in the early morning hours of March 19, 2021. After the collision, the Google user searched for “taller mecanico near me,” which translates to “mechanic workshop” or garage. There were also searches for “body shop,” glass repair, and headlight replacement. Simultaneously, the user was also extensively Googling information regarding the Honduran Consulate in the Dallas, Texas area.

12. A subpoena was served upon the North Texas Tollway Authority to obtain photographs of vehicle traffic at the precise time Fuentes’ GPS coordinates placed her device at the toll plazas. According to those results, a 2013 Nissan Maxima with temporary Texas plate 02163V6 was present, this vehicle was registered to Fuentes. Also visible in the toll photographs is damage to the front passenger side and the windshield is broken.

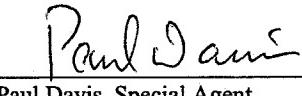
13. Lastly, additional analysis of the geolocation data provided by Google LLC shows that Fuentes visited a Bank of America in the Dallas-Fort Worth area. Bank of America provided ATM video surveillance footage in the early morning hours of March 20, 2021 which shows Fuentes’ black Nissan Maxima, bearing temporary Texas tag 02163V6, driven by Fuentes, retrieving money from a drive through ATM location. In the video, the same front passenger side damage is clearly visible and the windshield has blue tape on the top seam which is typically done after a windshield has been replaced. The vehicle in the Bank of America surveillance video is identical to the vehicle in Fuentes’ photograph.

14. On October 21, 2021, Fuentes was interviewed at her residence in Pasadena, Texas. After identification of the interviewing FBI agents, Fuentes admitted that she was driving from Fayetteville, Arkansas to Dallas, Texas on March 18, 2021. Fuentes stated that while she was

driving on a dark highway in rural Oklahoma, she struck a bicycle. Fuentes stated that she believed the bicycle was unoccupied on the side of the road. After the impact with the bicycle, Fuentes stated that she did not exit her vehicle to check for damage or injury to any persons.

15. Based on a review of this case, and based on my knowledge and experience, I have probable cause to believe SILVIA VERONICA FUENTES committed the offense of Failure to Stop for Accident Involving Death in Indian Country in violation of Title 18, United States Code Sections 13, 1151, and 1152 as well as a violation of Title 47, Oklahoma Statutes, Section 10-102.1.

Respectfully Submitted,

  
\_\_\_\_\_  
Paul Davis, Special Agent  
Federal Bureau of Investigation

Sworn before me October 21, 2021.

  
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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF OKLAHOMA